

REMARKS

Claims 1-2, 4-6 and 8-10 are pending in this application. By this Amendment, Claims 1 and 5 are amended. Applicants respectfully submit that no new matter is added herein.

Entry of Response Proper

Entry of this Amendment is proper under 37 C.F.R. §1.116 since the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issues requiring further search and/or consideration on the part of the Examiner as the Amendment merely clarifies the claimed features of the invention; (c) satisfy a requirement of form asserted in the previous Office Action; (d) do not present any additional claims without canceling a corresponding number of finally rejected claims; and (e) place the application in better form for appeal, should an appeal be necessary. The Amendment is necessary and was not earlier presented because it is made in response to objections raised in the Final Rejection. Entry of the Amendment is thus respectfully requested.

Claim Rejections – 35 U.S.C. §102 and §103

Claims 1-2, 4 and 9 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,646,233 to Kanno et al. (Kanno). Claims 5, 6, 8 and 10 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Number 6,771,483 to Harada et al. (Harada) in view of U.S. Patent No. 5,625,526 to Watanabe and Kanno. Applicants respectfully traverse the rejections.

Claims 1 and 5 each recite an electrostatic chuck including, among other features, a feeder terminal portion having members and an electrode, wherein the

members of the feeder terminal portion are fixed to the electrode by brazing, diffusion bonding, or soldering. As a result of the claimed invention, since the electrode (or at least a portion of the electrode) and the members of the feeder terminal portion are fixed to each other by brazing, diffusion bonding, or soldering as described above, when the temperature in a chamber in which the electrostatic chuck is provided rises to be more than 200°C during semiconductor processing, the electrode (or at least a portion of the electrode) and the respective members of the feeder terminal portion are securely fixed to each other, and dielectric breakdown due to electric discharge is prevented from occurring between the substrate and the electrode of the feeder terminal portion which is fixed to the substrate by mechanical joining. Therefore, the electrostatic chuck of the claimed invention is repeatedly usable under high temperatures during semiconductor processing.

Applicants respectfully submit that Kanno does not disclose, teach or otherwise suggest each and every feature recited by Claims and 5.

For example, in column 15, lines 9 to 17 and Fig. 16 of Kanno, the brazing referenced by the Office Action in the *Response to Remarks/Arguments* section is indeed used for brazing elements in an electrostatic check, however the brazing is actually used for fixing a ceramic heater 69 containing therein a heater wiring 70 and a structure with a sprayed film 68 of ceramics 15 provided on an aluminum base material 67. However, the elements 15, 67, 69 in Fig. 16 of Kanno correspond to the substrate of the present invention. As described in column 15, lines 9 to 20, in column 4, line 66 to column 5, line 4 and Fig. 2, and in column 10, lines 5 to 8 and Fig. 7 of Kanno, a shaft 20 and a dielectric pipe (which corresponds to an element 47 in Fig. 7) fixed

theraround correspond to the feeder terminal portion of the present invention. But Kanno does not disclose, teach or otherwise suggest a technique for fixing the shaft 20 and the dielectric pipe 47 to each other. In addition, as shown in Fig. 7, a plug 51 and a guide 50 of Kanno, which are recognized as elements of the feeder terminal portion by the Office Action, are fixed to teach other by mechanical joining using a bolt 49.

As explained above, the technique disclosed by Kanno for fixing the various components together is clearly different than the claimed invention wherein the electrode (or at least a portion of the electrode) and the members of the feeder terminal portion are fixed to teach other by brazing, diffusion bonding, or soldering. Due to the above described disclosure of Kanno and the corresponding fixing technique, Kanno not only does not disclose, teach or otherwise suggest the structure/method of the claimed invention, but Kanno cannot derive or otherwise obtain the benefits flowing from the claimed invention wherein at least the electrostatic chuck can be repeatedly used under high temperatures during semiconductor processing.

Harada does not disclose, teach or otherwise suggest, at all, a feeder terminal portion. As such, Harada does not cure or otherwise address the above-described deficiencies of Kanno.

In Watanabe, as disclosed in column 9, line 62 to column 10, line 4 and Fig. 16, brazing is used for fixing a dielectric portion 186 of a feeder terminal portion and a recess 182 of a substrate 6 to each other. However, Watanabe does not disclose a technique for fixing a pin 180 of the feeder terminal portion and the dielectric portion 186 of the feeder terminal portion to each other. Due to this, Watanabe cannot obtain the

above actions and effects of the present invention that the electrostatic chuck can be repeatedly used under high temperatures during semiconductor processing.

In view of the above, Applicants respectfully submit that Kanno, Harada and Watanabe, alone or in any combination thereof, fail to disclose or suggest each and every feature recited by Claims 1 and 5.

To qualify as prior art, a single reference must teach, i.e., identically disclose, each and every feature recited by a rejected claim.

Furthermore, to establish *prima facie* obviousness, each feature of a rejected claim must be taught or suggested by the applied art of record. See M.P.E.P. §2143.03.

As explained above, Kanno, Harada and/or Watanabe, alone or in combination, do not disclose or suggest each feature recited by Claims 1 and 5. Therefore, Kanno, Harada and/or Watanabe do not anticipate, nor render obvious, the invention recited by Claims 1 and 5.

Accordingly, Applicants respectfully submit Claims 1 and 5 should be deemed allowable over Kanno, Harada and Watanabe.

Claims 2, 4 and 9 depend from Claim 1. Claims 6, 8 and 10 depend from Claim 5. It is respectfully submitted that these dependent claims be deemed allowable for at least the same reasons Claims 1 and 5 are allowable, as well as for the additional subject matter recited therein.

Applicants respectfully request withdrawal of the rejections.

Conclusion

In view of the foregoing, reconsideration of the application, withdrawal of the outstanding rejections, allowance of Claims 1-2, 4-6 and 8-10, and the prompt issuance of a Notice of Allowability are respectfully solicited.

Should the Examiner believe anything further is desirable in order to place this application in better condition for allowance, the Examiner is requested to contact the undersigned at the telephone number listed below.

In the event this paper is not considered to be timely filed, the Applicants respectfully petition for an appropriate extension of time. Any fees for such an extension, together with any additional fees that may be due with respect to this paper, may be charged to counsel's Deposit Account No. 01-2300, **referencing docket number 108421-00095.**

Respectfully submitted,
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